

1 Norman G. Reece, Jr.
2 Idaho State Bar No. 3898
3 NORMAN G. REECE, P.C.
4 445 West Chubbuck Road, Suite D
5 Chubbuck, Idaho 83202
6 Tel: (208) 233-0128
7 Fax: (208) 233-4895
8 E-Mail: normreecelaw@aol.com
9 *Pro Hac Vice*

10 Attorney for Plaintiff

11 DEK KETCHUM, SB No. 48109
12 JAY M. GOLDMAN, SB No. 168141
13 LAW OFFICES OF DEK KETCHUM
14 900 Veterans Boulevard, Suite 600
15 Redwood City, Calif. 94063
16 Tel: (650) 368-2588
17 Fax: (650) 369-7183
18 E-Mail: JGoldman1@aol.com

19 Attorneys for Defendant
20 Farr Financial, Inc.

21 **UNITED STATES DISTRICT COURT**
22 **NORTHERN DISTRICT OF CALIFORNIA**
23 **SAN FRANCISCO DIVISION**

24 HOWARD B. HIGGINS, an individual,
25
26 Plaintiff,

27 vs.

28 FARR FINANCIAL INC., a California
Corporation, ZENITH INVESTMENT
GROUP LLC, a California Limited
Liability Company, AMAECHI
GEORGE OZOR, an individual, and
JOHN/JANE DOES I-X, individuals or
entities whose identities are unknown,

Defendants.

Case No. C 07-02200 JSW

**STIPULATION TO CONTINUE
AND PROPOSED ORDER**

Judge: Hon. Jeffrey S. White
Ctrm.: 2, 17th Floor
Trial: None Set

1 Defendant Farr Financial, Inc. ("Farr") and Plaintiff Howard B. Higgins
2 ("Higgins"), hereby stipulate to continue the Initial Case Management Conference,
3 presently set for January 8, 2010 at 1:30 p.m.
4

5 Good cause exists to support this stipulation and the request that the Court grant
6 the accompanying proposed order. First of all, the parties have agreed to submit this matter
7 to mediation which will commence February 18, 2010 before a private mediator, Joan
8 Proress. Secondly, lead counsel reside in Illinois and Idaho, and desire to have the Initial
9 Case Management Conference postponed to a time later in 2010 when the potential for
10 flight delays due to weather is lower.
11

12 Therefore, the parties request the Initial Case Management Conference to be
13 continued until after the private mediation scheduled to commence February 18, 2010.
14

15 There has been no prior request to extend the January 8, 2010 conference. The
16 parties know of no other deadline or event set in this case. Therefore, continuing the Initial
17 Case Management Conference will not adversely affect the schedule of this case.
18

19 This stipulation and proposed order, if granted, avoids the necessity of the parties
20 to file, and for the Court to adjudicate, an administrative motion under Local Rule 7-11 in
21 this regard. Therefore, the parties respectfully request that the Court grant this proposed
22 order.
23

24 IT IS SO STIPULATED.
25
26
27
28


1 Dated: _____

NORMAN G. REECE, P.C.

2
3
4 By: _____
5 NORMAN G. REECE, JR.
6 Attorney for Plaintiff, Howard B. Higgins
7 (Pro Hac Vice)

8 Dated: 1/4/10

LAW OFFICES OF DEK KETCHUM

10
11 By: 
12 JAY M. GOLDMAN
13 Attorneys for Defendant, Farr Financial, Inc.

14
15
16 **ORDER**

17 Good cause appearing, **IT IS ORDERED** that the stipulation and proposed order
18 is **GRANTED**. The Initial Case Management Conference shall be postponed until after
19 the private mediation set to commence February 18, 2010.

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: January ____, 2010.

22
23
24
25
26 _____
27 HON. JEFFREY S. WHITE
28 United States District Judge

1 Dated: January 4, 2010

NORMAN G. REECE, P.C.

2
3 By: Norman G. Reece, Jr.
4 NORMAN G. REECE, JR.
5 Attorney for Plaintiff, Howard B. Higgins
6 (Pro Hac Vice)
7

8 Dated: _____

LAW OFFICES OF DEK KETCHUM

9
10
11 By: _____
12 JAY M. GOLDMAN
13 Attorneys for Defendant, Farr Financial, Inc.
14

15
16 **ORDER**

17 Good cause appearing, **IT IS ORDERED** that the stipulation and proposed order
18 is **GRANTED**. The Initial Case Management Conference shall be ~~postponed until after~~
19 ~~the private mediation set to commence February 18, 2010.~~ continued to March 5, 2010.

20 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

21 Dated: January 5, 2010.

22
23
24
25 Jeffrey S. White
26 HON. JEFFREY S. WHITE
27 United States District Judge
28